

RECEIVED  
U.S. Bankruptcy Court

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF

FRANCISCO REYES VERJARANO  
AMERICAN GENERAL CORPORATION  
C.R. CARIBBEAN REALTORS CO., INC.

DEBTORS

KENNETH A. WELT, TRUSTEE of the  
Estate of Francisco Reyes Vejarano

PLAINTIFF

v.

JOSE M. VIVO VILELLA

DEFENDANT

KENNETH A. WELT, TRUSTEE of the  
Estate of Francisco Reyes Vejarano

PLAINTIFF

v.

PRISICLLA FIGUEROA BARRETO

DEFENDANT

: CONSOLIDATED CASES  
: NO. 93-03764 (SEK)  
: NO 93-05105 (SEK)  
: NO 93-05106 (SEK)  
: CHAPTER 7

: ADV. NO. 95-0090

: ADV. NO. 95-00148

OBJECTION TO REQUEST FOR PAYMENT  
OF ADMINISTRATIVE EXPENSES

FRANCISCO REYES VEJARANO, DEBTOR, appearing here pro se  
respectfully objects to the payment of the administrative expenses  
claimed by the United States, in support of which he informs the

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Court as follows:

1. To the best of his knowledge, neither Debtor nor any person authorized to represent him or acting as his agent has obtained any income from the rental contracts in existence at the time his property was seized by the United States pursuant to its civil forfeiture action in February, 1993. This includes Priscilla Figueroa Barreto.

2. To the best of Debtor's knowledge, information and belief, the following rental contracts were in effect at the time the United States seized the following properties:

PROPERTY	RENTER	MONTHLY RENT DUE
Domenech 224	Farmacia Fatima	\$1,500.00
" "	J.J. Copy	\$1,500.00
" "	Sastrería	650.00
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TOTAL DE ARRENDAMIENTOS DE DOMENECH 224		\$3,650.00
Total rent on 224 Domenech		

Número de meses desde la confiscación:  
Number of months since confiscation:

x39

TOTAL INCOME RECEIVED OR COLLECTABLE BY UNITED STATES PURSUANT TO RENTAL CONTRACTS AT 224 DOMENECH IN EFFECT AT TIME OF SEIZURE	\$142,350.00
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PROPERTY	RENTER	MONTHLY RENT DUE
Calle Sol		650.00
		x39
		\$26,350.00

TOTAL AMOUNT OF RENT COLLECTABLE PURSUANT TO CONTRACTS IN EFFECT AT TIME OF SEIZURE TO PRESENT	\$168,700.00
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3. To the best of Debtor's knowledge, information and belief, the rent on these properties was either not collected, or collected and paid to agents of the United States who did not use it to pay the outstanding mortgages on the properties, resulting in unnecessary injury and expense to the estate in the form of interest, penalty and other actions caused by the failure of the United States and/or the Trustee to properly administer the properties.

4. For the United States to now claim that it is entitled to be reimbursed for thousands of dollars of "administrative expenses" is offensive.

5. Not only did its representatives fail to responsibly administer the income created by these properties, but they also totally abandoned their duty to secure them from theft and vandalism, resulting in the loss of many valuable items of personal property.

6. The documentation demonstrating the existing rental contracts and mortgages has at all times been in the custody and control of the United States.

7. Debtor will file a statement of personal property lost due to repeated theft and/or vandalism at what was his home at Calle Marbella 59.

WHEREFORE, it is respectfully prayed that this Court not sanction and further reward the negligence of the United States with respect to his properties by granting its requests for reimbursements, when it is the United States that should be

reimbursing the estate and Debtor.

RESPECTFULLY SUBMITTED,

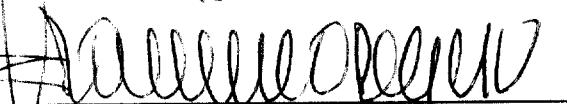
  
FRANCISCO REYES VEJARANO

Pro Se  
Estill, South Carolina

 May 1996

**AFFIDAVIT**

Francisco Reyes Vejarano, an adult citizen of the Republic of Colombia, presently incarcerated at FCI Estill, Estill, South Carolina, hereby affirms under pain and penalty of perjury that all of the foregoing statements of fact made according to his personal knowledge are true, and that as to those made according to information and belief, they are true to the best of his information and belief.

  
FRANCISCO REYES VEJARANO

Federal Correctional  
Institution  
Estill, South Carolina

Date 5 - 30 - 94

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relative to the

FRANCISCO REYES VEJARANO  
# 08903-069 UNIT 3-B  
F.C.I.  
P.O.BOX 599  
ESTILL, S.C. 29918-0599

LEGAL MAIL

HONORABLE JUDGE  
SARA DE JESUS  
U.S. BANKRUPTCY COURT  
FEDERAL BLDG, CHARDON STREET  
HATO REY, PUERTO RICO 00918

